

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: LAURA E. BAYER	:	CHAPTER 13
Debtor	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
LAURA E. BAYER	:	
Respondent	:	CASE NO. 1-22-bk-00497

TRUSTEE'S OBJECTION TO AMENDED CHAPTER 13 PLAN

AND NOW, this 6th day of July, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor's plan for the following reason(s):

1. Debtor's plan violates 11 U.S.C. §§ 1322(a)(1) and 1325(b) in that the debtor has not submitted all or such portion of the disposable income to the Trustee as required.
2. The Trustee avers that debtor's plan is not feasible based upon the following:
 - a. Insufficient Monthly Net Income as indicated on Schedules I and J.
 - b. Arrears claims not in plan. (M & T Bank – Claim #8 and Ally Bank – Claim #9)
3. Trustee avers that debtor's plan cannot be administered due to the lack of the following:
 - a. The debtor has not provided to the Trustee copies of 2021 Federal Income Tax returns as required by § 521(e)(2)(A).
4. Section 1.A(4) incorrectly states that "\$-0-" must be paid to unsecured creditors to comply with the Means Test, it should state that \$114,412.20 must be paid to comply with the Means Test.

WHEREFORE, Trustee alleges and avers that debtor's plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.

- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Douglas R. Reider
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 6th day of July, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Nicholas Platt, Esquire
230 York Street
Hanover, PA 17331

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee